



REPLY TO DES MOINES OFFICE

September 17, 2008

Via e-mail to Mr. Robert Somers robert.somers@fcc.gov
and Ms. Marcy Greene marcy.greene@fcc.gov

Re: File No. EB-08-TC-6059

Dear Mr. Somers and Ms. Green:

This firm serves as outside legal and regulatory counsel to Woolstock Mutual Telephone Association, an Iowa corporation ("WMTA") and its wholly owned subsidiary, Woolstock Fiber Company, an Iowa corporation ("WFC"). This letter is in response to the Enforcement Bureau's inquiry dated September 5, 2008, regarding WFC's compliance with Section 222 of the Communications Act, as amended, 47 USC § 222 and section 64.2009(e) of the Commission's rules, 47 CFR § 64.2009(e), regarding customer proprietary network information.

WFC did not file a 47 CFR § 64.2009(e) compliance certificate for calendar year 2007. WFC is not required to file a compliance certificate for calendar year 2007 because it is not a telecommunications carrier, as defined in 47 U.S.C. § 153(44). Specifically, WFC did not offer telecommunications for a fee directly to the public or to any class of users as to be effectively available directly to the public during calendar year 2007.

Enclosed is a declaration under penalty of perjury signed by Jack Blair and attesting to the representations provided in this response.

WMTA and WFC are hereby requesting guidance from the Enforcement Bureau as to any additional action to be taken in connection with this matter. Please contact the undersigned at 515-288-2500 or at johnpietila@davisbrownlaw.com if you have any questions regarding this letter or require any further response or action from WMTA or WFC in connection with these matters.

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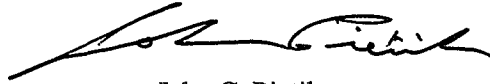
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DAVIS BROWN KOEHN SHORS & ROBERTS P.C.

Mr. Robert Somers and Ms. Marcy Greene
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Sincerely,

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

A handwritten signature in black ink, appearing to read "John C. Pietila". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a distinct "Pietila" at the end.

John C. Pietila

Enclosures

DECLARATION OF JACK BLAIR

I, Jack Blair, acting under penalty of perjury, hereby declare as follows:

1. I am Manager of Woolstock Mutual Telephone Association, an Iowa corporation ("WMTA") and its wholly owned subsidiary, Woolstock Fiber Company, an Iowa corporation ("WFC"). I make this declaration in support of WFC's response to an inquiry by the Federal Communications Commission Enforcement Bureau dated September 5, 2008 (the "**Enforcement Inquiry**") regarding an apparent violation of Commission rule 64.2009(e).

2. As Manager, I am the employee or officer of WMTA and WFC with responsibility for overseeing all company operations to ensure compliance with established company policies and all federal, state and local regulations, including compliance with the Commission's CPNI rules.

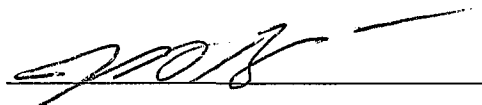
3. I have assisted in the preparation of the response letter accompanying this Declaration.

4. I have reviewed said response letter, am familiar with its contents, and state that the information contained therein and herein is true and accurate.

5. In connection with said response letter, I further specifically attest to and declare the following:

- I am the employee of WMTA and WFC with responsibility for the filing of the companys' 47 CFR § 64.2009(e) compliance certification on an annual basis.
- WFC did not file a 47 CFR § 64.2009(e) compliance certification for calendar year 2007.
- WFC did not file a 47 CFR § 64.2009(e) compliance certification for calendar year 2007 because it is not a telecommunications carrier, as defined in 47 U.S.C. § 153(44). WFC did not offer telecommunications for a fee directly to the public or to any class of users as to be effectively available directly to the public during calendar year 2007.
- All information and documents requested by the Enforcement Inquiry that are in the possession, custody, control or knowledge of WMTA and WFC have been produced.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 16, 2008.

A handwritten signature in black ink, appearing to read "J. Blair", is written over a horizontal line.

Jack Blair, Manager
Woolstock Mutual Telephone Association
Woolstock Fiber Company